

Message

From: Nitsch, Chad [Nitsch.Chad@epa.gov]
Sent: 5/23/2019 5:51:34 PM
To: Chow, Alice [chow.alice@epa.gov]
Subject: Re: Update on EtO internal meeting

Awards ceremony ended early, so I'll be on the call.

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US Environmental Protection Agency - Region 3 (Mid-Atlantic: WV, VA, PA, MD, DE, DC)
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On May 23, 2019, at 1:26 PM, Chow, Alice <chow.alice@epa.gov> wrote:

<image001.gif>

Cristina: FYI, we discussed our preferences on next steps and came up with the following:

- For Braun, we would prefer stack testing to determine emission rates. Also, there may have been calculation errors and/or very conservative estimates made for emissions. Therefore, we think the best thing to do is to do a stack test. Will have to talk to PADEP.
- For 2 Union Carbide facilities and Covestro (very close to the Union Carbide So. Charleston facility)—we are going to find out if NEIC can do LDAR to determine fugitive emissions. Gwen will check with OECA to see if this is something they can push for and what the timeframe would be.
- For Croda (not greater than 1000 in a million risk, but over 100 in a million)—we need to find out from DNREC what kinds of permitting conditions they plan to put in place before they start up...LDAR components? Gwen will check with DNREC.
- For the other 4 facilities, we have to talk to the WVDEP and PADEP to see what they think. I will be talking to WVDEP next week. Will reach out to PADEP when I get back to the office.
- For Communication, Chad's folks will begin working on a desk statement that discusses the work that we have done and plan to do. Gail will tie in Reggie from Samantha's group to bring them up to date on EtO and communities.

Alice

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